IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

SOUTHERN DISTRICT OF MISSISSIPPI
FILED
MAY -3 2016
ARTHUR JOHNSTON
BY ______ DEPUTY

UNITED STATES OF AMERICA

v. CRIMINAL NO. 1:16cr35LG-RHW

BOBBIE GAYLE GARTIN,
REGINALD TRACY DANIELS, and
TRACY JERMAINE RICHARD

21 U.S.C. § 846
21 U.S.C. § 841(a)(1)

The Grand Jury charges:

COUNT 1

That beginning sometime in November 2014 and continuing up to the date of this Indictment, in Harrison County, in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendants, **BOBBIE GAYLE GARTIN, REGINALD TRACY DANIELS** and **TRACY JERMAINE RICHARD**, did knowingly and willfully conspire with others both known and unknown to the Grand Jury, to possess with intent to distribute cocaine hydrochloride, a Schedule II narcotic drug controlled substance as prohibited by Section 841(a)(1), Title 21, United States Code, and Section 2, Title 18, United States Code.

All in violation of Section 846, Title 21, United States Code.

QUANTITY OF ACTUAL COCAINE HYDROCHLORIDE

INVOLVED IN THE CONSPIRACY

With respect to **BOBBIE GAYLE GARTIN,** the amount involved in the conspiracy attributable to her as a result of her conduct, and the conduct of other conspirators reasonably foreseeable to her, is 5 kilograms or more of cocaine hydrochloride in violation of Title 21, United States Code, Section 841(b)(1)(A).

With respect to **REGINALD TRACY DANIELS**, the amount involved in the conspiracy attributable to him as a result of his conduct, and the conduct of other conspirators reasonably foreseeable to him, is 5 kilograms or more of cocaine hydrochloride in violation of Title 21, United States Code, Section 841(b)(1)(A) & (B).

With respect to **TRACY JERMAINE RICHARD**, the amount involved in the conspiracy attributable to him as a result of his conduct, and the conduct of other conspirators reasonably foreseeable to him, is 5 kilograms or more of cocaine hydrochloride in violation of Title 21, United States Code, Section 841(b)(1)(A).

COUNT 2

That on or about January 14, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendants, **BOBBIE GAYLE GARTIN, REGINALD TRACY DANIELS** and **TRACY JERMAINE RICHARD**, aided and abetted by each other and others known and unknown to the Grand Jury, did knowingly and intentionally attempt to possess with intent to distribute 1 kilogram of cocaine hydrochloride, a Schedule II narcotic drug controlled substance in violation of Section 846, Title 21, United States Code and Section 2, Title 18, United States Code.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offenses as alleged in this Indictment, the defendants shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offenses. Further, if any property described above, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendants, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Section 853, Title 21, United States Code.

Gregory K. Davis

GREGORY K. DAVIS
United States Attorney

A TRUE BILL:

s/signature redacted
Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the Grand Jury on this the 3rd day of May, 2016.

Linda R. Anderson

UNITED STATES MAGISTRATE JUDGE